



GAIL FARBER, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

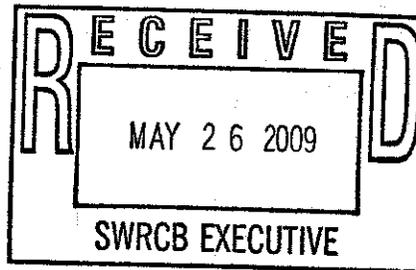
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May 26, 2009

IN REPLY PLEASE
REFER TO FILE: WW-1

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Dear Ms. Townsend:

COMMENT LETTER - LANDSCAPE IRRIGATION GENERAL PERMIT MAY DRAFT

The County of Los Angeles supports the State Water Resources Control Board in developing a landscape irrigation general permit for recycled water. The County appreciates the opportunity to, once again, provide comments on the latest draft of the General Permit. The County recognizes that recycled water is a valuable resource and understands the increasingly important role recycled water will play in meeting the future demand for water within California. On February 20, 2007, the County Board of Supervisors approved forming the Office of Water Recycling and charged the office with doubling the amount of recycled water used within the County by 2030. On November 13, 2007, the County Board of Supervisors approved an agreement for the purchase and sale of recycled water between the Los Angeles County Waterworks District No. 40, Antelope Valley, and the County Sanitation District Nos. 14 and 20, Lancaster and Palmdale, of the Los Angeles County.

The Office of Water Recycling and the Los Angeles County Waterworks Districts have prepared this letter in response to the revised May 2009 draft *General Waste Discharge Requirements for Landscape Irrigation Uses of Municipal Recycled Water* (General Permit) that was recirculated for review. Comments on the revised General Permit are enclosed.

We support the promotion of recycled water as a safe alternative to potable water for approved uses in compliance with the State's Recycled Water Policy, Title 22, and all applicable State and Federal water quality laws. We support the State's decision to streamline the permitting process for producers and distributors of recycled water for

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landscape irrigation uses. We believe that a number of the findings in the General Permit generally create the impression that recycled water is a water quality threat. We believe that this is inconsistent with the Policy and the California Water Code and recommend adopting a General Permit that is consistent with the objectives of the Policy.

Thank you for the opportunity to participate in the State Water Board's planning process for this General Permit. If you have any questions or require additional information, please contact Mr. Jonathan King at (626) 300-3389.

Very truly yours,

GAIL FARBER
Director of Public Works



DANIEL J. LAFFERTY
General Manager
Office of Water Recycling

JK:lr
LTS017

Enc.

ATTACHMENT

DISCHARGE PROHIBITIONS

- Prohibition No. 4 restates Title 22's requirement that recycled water is not intended for direct human consumption nor is it suitable for food or drink processing. This provision is outside of the landscape irrigation context, which is the subject of the General Permit. We recommend deleting Prohibition No. 4 and addressing it in a separate, abbreviated and newly created finding addressing the scope of permit applicability.

MONITORING AND REPORTING PROGRAM

- We find many of the monitoring and reporting requirements in the General Permit to be overly prescriptive. Based on the recommendations of several agencies operating recycled water systems with landscape irrigation uses under existing Master Permits, we would not seek coverage under the General Permit and opt for coverage under a Master Permit instead. These agencies report much more reasonable monitoring and reporting requirements to achieve compliance under a Master Permit. It is our understanding that the reason for the excessive monitoring and reporting requirements under the draft General Permit is due to the streamlined nature of the application process, which removes the Regional Boards and California Department of Public Health from having environmental oversight over individual projects. Given the choice, the District would forgo initial time savings and involve these regulators in the project review process, so that we may save considerable time, money, and resources complying with a Master Permit upon acceptance.

ATTACHMENT C-BEST MANAGEMENT PRACTICES (BMPs)

- On page C-1, under the heading "Required BMPs," the Draft General Permit was changed to require implementation of an O&M Plan that provides for detection of leaks and correction, either within 72 hours of learning of a leak or prior to the release of 1,000 gallons. The previous draft referenced a threshold of 50,000 gallons. It is our understanding that this limit, taken directly from the Recycled Water Policy, would apply to end users as part of controlling incidental run-off. We would request that the General Permit specify that this limit applies to end use areas and not mainline distribution systems.
- On page C-2, under the heading "Efficient Irrigation" and the sub-heading "Maintenance," there is a SPELLING ERROR. We recommend making the following correction: "M. Routinely adjust sprinkler heads so they achieve 80% head to head coverage though throughout their intended arc."

ATTACHMENT F-USE AREA DAILY & ANNUAL REPORTING FORMAT

- The General Permit was revised to require Monthly monitoring and Annual Reporting; however, many of the HEADINGS and TITLES on this Attachment HAVE NOT BEEN CHANGED.